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State of Utah  
DEPARTMENT OF COMMERCE  
Office of Consumer Services

MICHELE BECK  
Director

To: Public Service Commission

From: Office of Consumer Services  
Michele Beck, Director  
Gavin Mangelson, Utility Analyst

Date: August 4, 2015

Subject: Docket 15-035-T13

**In the Matter of:** Rocky Mountain Power's Changes to Schedule 111 -  
Home Energy Savings Program

### **Background**

On July 15, 2015 Rocky Mountain Power Company (Company) filed with the Public Service Commission (Commission) proposed revisions to Schedule No. 111, Home Energy Savings Plan. The Commission subsequently issued a Notice of Filing and Comment Period on July 29, 2015.

Schedule 111 is a portion of the Company's Demand Side Management (DSM) portfolio that provides, among other things, rebate incentives to rate payers who purchase qualifying energy efficient equipment for use in their homes.

The Company's cover letter states that it has indentified some small refrigerators that meet CEE Tier III standards and therefore qualify for the associated \$100 rebate. However, the cost of these refrigerators may be at or near \$100 in price. The Company is therefore proposing to add language restricting incentive eligibility to refrigerators with sizes consistent to that of a typical household refrigerator.

### **Discussion**

The Office of Consumer Services (Office) has historically advocated for policies that prevent rebates from covering 100% of any purchase price or of attracting free ridership. The Company and other intervenors have typically agreed with this position.

The Office therefore supports the proposed change to requirements for equipment to qualify for the refrigerator incentive.

The Company also proposes to add “up to” language on remaining incentives in Schedule 111, thereby asserting flexibility to lower incentives amounts as needed and after proper notice has been provided. The Office also supports this request.

**Recommendation**

The Office recommends that the Commission approve the proposed changes to Schedule 111.

Copies To: Rocky Mountain Power  
Bill Comeau, Director

Division of Public Utilities  
Chris Parker, Director  
Artie Powell, Energy Section Manager